



**U.S. Department of Justice**

Civil Division  
Federal Programs Branch

---

May 16, 2019

**BY ECF**

The Honorable Edgardo Ramos  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: *State of New York, et al. v. U.S. Dep't of Justice*, 18-cv-6471 (ER)  
*City of New York v. William P. Barr, et al.*, 18-cv-6474 (ER)

Dear Judge Ramos:

On behalf of the Federal defendants (the “Government”) in the above-captioned actions, I write to seek leave from the Court to file an upcoming Reply Brief of up to 19 pages, exclusive of table of contents, table of authorities, and signature page. I have conferred with counsel for the Plaintiffs, and they have graciously advised that they do not oppose this request.

On May 17, 2019, the Government will file a Reply Brief regarding the Fiscal Year 2018 Byrne JAG conditions, pursuant to the agreed briefing schedule previously entered by the Court. *See* ECF No. 129, Case No. 18-cv-06471. The Court’s Individual Practices sets the default length for a Reply Brief at 10 pages. The Plaintiffs have submitted approximately 62 pages of briefing on the FY 18 conditions (33 pages in their opening brief and 29 pages in their reply/opposition brief) while the Government has only submitted 27 pages in its opening brief on the FY 18 conditions. Given the significant legal issues in these cases, the Government requests leave to submit a Reply Brief of up to 19 pages.

I thank the Court for its consideration of this submission.

Respectfully submitted,

JOSEPH H. HUNT  
Assistant Attorney General

JOHN R. TYLER  
Assistant Director

/s/ Daniel D. Mauler  
DANIEL D. MAULER  
Trial Attorney  
U.S. Department of Justice  
Civil Division, Federal Programs Branch  
1100 L Street, NW  
Washington, DC 20005  
(202) 616-0773  
(202) 616-8470 (fax)

The Honorable Edgardo Ramos  
May 16, 2019  
Page 2

*dan.mauler@usdoj.gov*  
*Counsel for the Defendants*

cc: All counsel of record (by ECF)